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9
10 UNITED STATES DISTRICT COURT
11 FOR THE EASTERN DISTRICT OF WASHINGTON
12

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 DONALD EUGENE GRIFFIN JR.,

17 Defendant.
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2:24-CR-65-TOR

INDICTMENT

Vio.: 18 U.S.C.

§ 2252A(a)(2)(A), (b)(1)

Distribution of Child

Pornography

(Count 1)

18 U.S.C. § 2252A(a)(2),

(b)(1)

Receipt of Child

Pornography

(Count 2)

18 U.S.C. § 2252A(a)(5)(B),

(b)(2)

Possession of Child

Pornography

(Count 3)

18 U.S.C. § 2253

Forfeiture Allegations

1 The Grand Jury charges:

2 COUNT 1

3 Beginning on or about November 2019 and continuing until on or about
4 March 26, 2020, in the Eastern District of Washington, the Defendant, DONALD
5 ^{Jr. ag} EUGENE GRIFFIN, did knowingly distribute child pornography, as defined in 18
6 U.S.C. § 2256(8)(A), which had been mailed, shipped and transported in interstate
7 commerce by any means, including by computer, and that was transported via any
8 means or facility of interstate and foreign commerce, to wit: images depicting
9 minor children engaging in sexually explicit conduct, including, but not limited to,
10 the lascivious exhibition of the genitals and pubic area, in violation of 18 U.S.C.
11 § 2252A(a)(2)(A), (b)(1).

12 COUNT 2

13 Beginning on or about June 9, 2019 and continuing until on or about March
14 26, 2020, in the Eastern District of Washington, the Defendant, DONALD
15 ^{Jr. ag} EUGENE GRIFFIN, did knowingly receive child pornography, as defined in 18
16 U.S.C. § 2256(8)(A), which had been mailed, shipped and transported in and
17 affecting interstate and foreign commerce by any means, including by computer,
18 and that was transported via any means or facility of interstate and foreign
19 commerce, to wit: still images and video files depicting minor and prepubescent
20 children engaging in sexually explicit conduct including actual and simulated
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1 intercourse, and the lascivious exhibition of the genitals and pubic area, as defined
2 in 18 U.S.C. § 2256(2)(A), all in violation of 18 U.S.C. § 2252A(a)(2), (b)(1).
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4 COUNT 3

5 On or about March 26, 2020, in the Eastern District of Washington, the
6 Defendant, DONALD EUGENE GRIFFIN, *Dr. adg* did knowingly possess material which
7 he knew contained one or more visual depictions of child pornography, as defined
8 in 18 U.S.C. § 2256(8)(A), the production of which involved the use of a minor
9 who had not attained 12 years of age engaging in sexually explicit conduct, and
10 which visual depictions were of such conduct that had been mailed, shipped or
11 transported in or affecting interstate or foreign commerce by any means, including
12 by computer, and had been mailed, shipped or transported using any means or
13 facility of interstate or foreign commerce, and that was produced using materials
14 that had been mailed, shipped, or transported in or affecting interstate or foreign
15 commerce, by any means including computer, all in violation of 18 U.S.C. §
16 2252A(a)(5)(B), (b)(2).
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22 NOTICE OF FORFEITURE ALLEGATIONS
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24 The allegations set forth in this Indictment are hereby realleged and
25 incorporated by reference for the purpose of alleging forfeitures.
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27 Pursuant to 18 U.S.C. § 2253, upon conviction of an offense(s) in violation of
28 18 U.S.C. § 2252A(a)(2)(A), (b)(1), Distribution of Child Pornography, (Count 1)

1 and/or 18 U.S.C. § 2252A(a)(2), (b)(1), Receipt of Child Pornography, (Count 2);
2 and/or 18 U.S.C. §2252A(a)(5)(B), (b)(2), Possession of Child Pornography
3 (Count 3), as alleged in this Indictment, the Defendant, DONALD EUGENE
4 GRIFFIN, shall forfeit to the United States any visual depiction described in
5 section 2251, 2251A, 2252, 2252A, 2252B, or 2260, or any book, magazine,
6 periodical, film, videotape, or other matter which contains any such visual
7 depiction, which was produced, transported, mailed, shipped or received in
8 violation of this chapter; any property, real or personal, constituting or traceable to
9 gross profits or other proceeds obtained from such offenses; and, any property, real
10 or personal, used or intended to be used to commit or to promote the commission
11 of such offenses, or any property traceable to such property. The property to be
12 forfeited includes, but is not limited to:
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- 14 - a Blue Packard Bell 32 GB Tablet, Model PB1009

15 If any of the property described above, as a result of any act or omission of
16 the defendant:
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- 18 a. cannot be located upon the exercise of due diligence;
19 b. has been transferred or sold to, or deposited with, a third party;
20 c. has been placed beyond the jurisdiction of the court;
21 d. has been substantially diminished in value; or
22 e. has been commingled with other property which cannot be divided
23 without difficulty,
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1 the United States of America shall be entitled to forfeiture of substitute property
2 pursuant to 21 U.S.C. § 853(p), as incorporated by 18 U.S.C. § 2253(b).
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4 DATED this 8 day of May 2024.
5

6 A TRUE BILL
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13 Rebecca R. Perez
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